THE HONORABLE MARSHA J. PECHMAN 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 YASMINE MAHONE, an individual, and Case No. 2:22-cv-00594-MJP BRANDON TOLE, an individual, on behalf of 10 themselves and all others similarly situated, STIPULATED MOTION TO **EXTEND CERTAIN CLASS** 11 Plaintiffs, **CERTIFICATION-RELATED** 12 **DEADLINES AND (PROPOSED)** v. ORDER 13 AMAZON.COM, INC., a Delaware corporation, NOTE ON MOTION CALENDAR: AMAZON.COM SERVICES LLC; a Delaware JULY 20, 2023 14 Limited Liability Company; AMAZON.COM DEDC, LLC; a Delaware Limited Liability 15 Company; and AMAZON.COM KYDC LLC, a 16 Delaware Limited Liability Company, 17 Defendants. 18 **STIPULATION** 19 Pursuant to Local Rules 7(d)(1), 10(g), and 16(b)(6), Plaintiffs Yasmine Mahone and 20 Brandon Tole and Defendant Amazon.com, Inc. ("Amazon") (together, the "parties") hereby 21 jointly stipulate as follows: 22 1. On April 10, 2023, the Court issued a Case Scheduling Order, which set a deadline 23 to complete class discovery on July 21, 2023 (Dkt. #58). The parties have tried to fit all of the 24 discovery within that time frame but there are still outstanding depositions that the parties have 25 noticed and need to complete. 26

STIPULATION TO EXTEND CERTAIN CLASS CERTIFICATION-RELATED DEADLINES AND [PROPOSED] ORDER – 1 (Case No. 22-CV-594)
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- 2. Amazon has noticed the depositions of Plaintiffs Yasmine Mahone and Brandon Tole. The parties have scheduled the depositions of Ms. Mahone and Mr. Tole for August 2 and August 3, 2023, respectively.
- 3. Plaintiffs noticed a Rule 30(b)(6) deposition of Amazon. The parties are meeting and conferring regarding the noticed topics. Plaintiffs noticed the Rule 30(b)(6) deposition for August 22, 2023.
- 4. The parties agree and stipulate to extend the time to complete class discovery until August 31, 2023, for the limited purpose of conducting the above-referenced depositions and completing document productions by both the parties. The parties also agree and stipulate that Plaintiffs' Motion for Class Certification be extended from August 31, 2023, to September 15, 2023.
- 5. Plaintiffs' Motion for Class Certification is currently due on August 31, 2023. Given the noticed 30(b)(6) deposition on for August 22, 2023, the parties have agreed, pending the Court's approval, to continue: (1) Plaintiffs' Class Certification motion filing deadline to September 15, 2023; (2) Defendants' Response to the Motion for Class Certification to November 15, 2023; and (3) Plaintiffs' Reply to December 15, 2023.
- 6. There have been no prior requests to extend the deadlines set in the Court's Case Scheduling Order and extending the deadlines as stipulated would not affect any other scheduled dates in the proceeding.

Perkins Coie LLP

1	RESPECTFULLY SUBMITTED this 20th of July 2023.
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[PROPOSED] ORDER
Based upon the foregoing Stipulation, IT IS SO ORDERED.
DATED this 20th_day of July, 2023.
Washer Helens
Marsha J. Pechman
United States Senior District Judge
PRESENTED BY:
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